

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

# E

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

**CL 2019/20-CPL**  
**February 2019**

**TO:** Codex Contact Points  
Interested International Organisations

**FROM:** Secretariat, Joint FAO/WHO Food Standards Programme,  
Codex Alimentarius Commission  
Viale delle Terme di Caracalla,  
00153 Rome, Italy

**SUBJECT** **Request for Comments: Analysis of Responses to CL 2018/68-CPL: draft two sections of the standard for quinoa**

**DEADLINE** **15 March 2019**

**COMMENTS: To:**

Codex Contact Point of the United States of  
America  
Food Safety Inspection Services, US  
Department of Agriculture  
E-mail: [USSEC-CCCPL@osec.usda.gov](mailto:USSEC-CCCPL@osec.usda.gov), Copy  
to: [ken.lowery@osec.usda.gov](mailto:ken.lowery@osec.usda.gov);  
[henry.kim@fda.hhs.gov](mailto:henry.kim@fda.hhs.gov)

**Copies to:**

Secretariat  
Codex Alimentarius Commission  
Joint FAO/WHO Food Standards  
Programme  
Viale delle Terme di Caracalla  
00153 Rome, Italy  
E-mail: [codex@fao.org](mailto:codex@fao.org)

## BACKGROUND

- The 41<sup>st</sup> Session of the Codex Alimentarius Commission (CAC41) agreed to<sup>1</sup>:
  - adopt, subject to the endorsement of the labelling provisions by CCFL45, the draft standard for quinoa at Step 8, with the exception of the provisions for moisture content and grain size, which were returned to Step 6; and
  - establish an EWG, chaired by Costa Rica, and co-chaired by Chile and the United States of America, working in English and Spanish, to continue the work on the provisions for moisture content and grain size.
- The Codex Secretariat distributed in July 2018, CL 2018/68-CPL requesting comments at step 6 on Section 3.2.1: Moisture content and Section 3.2.7: Grain size in the standard for quinoa.

## REQUEST FOR COMMENTS

- Comments are requested on whether the draft provisions for moisture content and grain size in the Standard for Quinoa presented in Appendix 2 are ready for adoption at Step 8.

---

<sup>1</sup> REP18/CAC, para. 56

## ANALYSIS OF RESPONSES TO CL 2018/68-CPL

1. In response to CL 2018/68-CPL, comments<sup>1</sup> were received from 7 member countries, which are detailed below.

### 3.2.1 Moisture content

2. Majority of comments supported the moisture content of 13.5%. Additionally, one comment proposed to include the following: "*Lower moisture limits should be required for certain destinations in relation to the climate, duration of transport, and storage. Governments accepting the standard are requested to indicate and justify the requirements in force in their country.*"

3. Two comments did not support the moisture content of 13.5%. One comment proposed a moisture content for the quinoa grain of 12.5% on dry weight basis<sup>2</sup> and recommended that the maximum moisture content for storage should not be based on cereal standards because chemical composition of cereals are different than quinoa, which is a Pseudocereal. Likewise, the comments mentioned that the moisture content of cereals should not be compared with the moisture content of quinoa grain because the biological and chemical structure is different.

### 3.2.7 Grain size

4. Majority of comments supported maintaining the four grain sizes (Extra-large, Large, Medium, Small) currently in the quinoa standard.

5. One comment proposed to eliminate the extra-large category so that only three categories are maintained (Large, Medium and Small).

6. One comment mentioned that when the quinoa standard was adopted at Step 5, no comments objected to four grain sizes and questioned the reasons for opposing the adoption at Step 8.

7. Taking into account comments received in response to CL 2018/68-CPL, in October 2018, Costa Rica, the United States of America and Chile, invited EWG members to send their comments on the following proposal as the first round of comments by the EWG:

- **Proposal No.1 for moisture content:** Maintain maximum moisture content of 13.5%, supported by some members and add a paragraph with the following text: "*Lower moisture limits should be required for certain destinations in relation to the climate, duration of transport, and storage. Governments accepting the standard are requested to indicate and justify the requirements in force in their country.*"
- **Proposal No.2 for moisture content:** include a range of values between 12% and 13.5% maximum.
- **Proposal for grain size:** maintain the 4 classifications: (Extra-large, Large, Medium, Small).

8. In response to the above proposals, comments were received from 5-member countries, which are detailed below:

- **Moisture content:** Four of the five comments supported the 13.5% moisture content. One comment proposed a moisture content with a maximum value of 12.5%. It also mentions that historically its exports have presented a moisture content between 9.30% to 12.00% so that the product arrives at its destination without problems of safe and outbreak of the grains. For this reason, if a minimum of 12.00% is established, the product would be out of the market.
- **Grain size:** Four of the five comments supported the four classifications for grain sizes. One comment proposed to include this requirement as an Annex that includes the 4 classifications: (Extra Large, Large, Medium, Small) or to eliminate the classification. The comment stated the objective of the Codex Standards is to protect consumer health and promote equity in international food trade; Therefore, the grain size requirement is not a crucial factor related to safety and could be addressed by the commercial contract. The commenter also stated that, in the Codex standards on cereals, only the Standard CODEX STAN 198-1995 for rice includes the classification in the part of the Annex. One comment supported three classifications (Large, Medium, Small) for grain sizes.

9. Based on the first round of comments received, Costa Rica, Chile and the United States of America propose the following parameters for the second round of comments:

---

<sup>1</sup> Comments are available in original languages [here](#).

<sup>2</sup> Provides technical support

- **Moisture content:** 13.5% maximum. including the following footnote proposed by a member: "*Lower moisture limits should be required for certain destinations in relation to the climate, duration of transport, and storage. Governments accepting the standard are requested to indicate and justify the requirements in force in their country.*"
- **Grain size**

Grain Size	Range mm
Extra Large	Greater than 2.0 mm
Large	Greater than 1.7 to 2.0 mm
Medium	1.4 to 1.7 mm
Small	Less than 1.4 mm

10. In response to the above proposal, comments were received from 5-member countries, which are detailed below:

- **Moisture content:** Three comments supported the proposed 13.5% moisture content. However, one of the three comments disagreed with the proposed footnote by stating that it is not in favor of international standards referring to national regulations, moreover if the lower limits are always within the upper limits, the footnote is not necessary. One comment stated that the trade in quinoa grains is made with 12.50% as the average value or as the maximum value of moisture in the destination market, so historically the quinoa has been exported with moisture content between 9.30% to 12.00% so that the product arrives without problems of safety and outbreak of the grains. For this reason, the member does not support the proposal raised by the EWG with a minimum of 12.00%, since its exporters would be left out of the market and the product would be located at lower values.
- **Grain size:** Three comments supported the four classification of grain sizes while two comments supported three classification of grain sizes.

#### CCCPL Chairperson's proposal

In view of the comments received in response to CL 2018/68-CPL and the output of the EWG, the CCCPL Chairperson proposed to collect comments on whether the draft provisions for moisture content and grain size presented in Appendix II are ready for adoption at Step 8.

**STANDARD FOR QUINOA****(Sections 3.2.1 Moisture Content and 3.2.7 Size)****3.2.1 Moisture content.** 13.5% maximum.

*Lower moisture limits should be required for certain destinations in relation to the climate, duration of transport, and storage. Governments accepting the standard are requested to indicate and justify the requirements in force in their country.*

**3.2.7 Size**

<b>Grain Size</b>	<b>Range mm</b>
Extra Large	Greater than 2.0 mm
Large	Greater than 1.7 to 2.0 mm
Medium	1.4 to 1.7 mm
Small	Less than 1.4 mm